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State of Ohio Environmental Protection Agency

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Bob Taft, Governor  
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July 29, 2002

Mr. Johnny Reising  
U.S. DOE FEMP  
P.O. Box 398705  
Cincinnati, OH 45329-8705

RE: PSP FOR PREDESIGN INVESTIGATION IN AREA 5

Dear Mr. Reising:

Ohio EPA has reviewed the Project Specific Plan for Predesign Investigation in Area 5, 20810-PSP-0005 Rev A DRAFT, submitted by DOE on June 20, 2002. Ohio EPA's comments are enclosed.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6354.

Sincerely,

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric U.S. EPA  
Terry Hagen, Fluor Daniel Fernald  
Francis Hodge, Tetrattech  
Ruth Vandegrift, ODH  
Mark Schupe, HSI Geotrans

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PROJECT SPECIFIC PLAN FOR PREDESIGN  
INVESTIGATION IN AREA 5

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Comments:

1. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.0                      Pg.#:                      Line #:                      Code: C  
Original Comment #  
Comment: Due to the lack of previous sampling and process activities in the area (asphalt, electrical substation, vehicles), PAH's should be added to the analyte list to ensure potential FRL exceedances are defined.
2. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.1.1                      Pg.#: 2-1                      Line #: 27-29                      Code: C  
Original Comment #  
Comment: The sampling protocol described for "paved and unpaved locations," appears to be lacking a couple steps in the procedure. For sample locations with overlying material, Ohio EPA believes that the depth of the sample must be taken to native soil. In addition, there is no mention of scanning the surface-sample location but, surveying soil cores is discussed. Please clarify.
3. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.1.1                      Pg.#: 2-1                      Line #: 30-35                      Code: C  
Original Comment #  
Comment: What will be done if the Geoprobe cannot recover sufficient sample volume for the sample? Specifically, the existence of a sub-base for the parking lot could make recovery difficult.
4. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.1.1                      Pg.#: 2-2                      Line #: 7-9                      Code: C  
Original Comment #  
Comment: What information is available relating to the "clean fill?" How was the fill verified as clean? Where did the clean soil come from and how long ago was the soil used to backfill the old trailer area? What measures were taken to avoid contamination in this area post fill placement? If the soil is **not** sampled, where will DOE dispose of it?
5. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.1.2                      Pg.#: 2-2                      Line #: 7-9                      Code: C  
Original Comment #  
Comment: A number of ditches exist within A5A-EF that do or previously did receive drainage from the former production area. Biased samples should be located along these streams as well as those around the previously mentioned SSOD area.

6. Commenting Organization: OEPA Commentor: OFFO  
Section #: 2.1.3 Pg.#: 2-3 Line #: 1-2 Code: C  
Original Comment #  
Comment: Based upon the available information and presentation, it is unclear if the existing data is sufficient to properly scope the IRDP for A5P. With the development of more useful modeling schematics, it is likely to become evident more data is required in this area. DOE should keep this in mind when developing the IRDP and be prepared to collect additional data in the area.
7. Commenting Organization: OEPA Commentor: OFFO  
Section #: 2.1.3 Pg.#: 2-3 Line #: 1-2 Code: C  
Original Comment #  
Comment: Although the soil around boring 11109 will be excavated, shouldn't DOE collect samples to determine the extent of contamination, i.e., bound? Ohio EPA takes issue with deleting boring location 11109 from the sampling round and believes it should be included to confirm the historical data and extent.
8. Commenting Organization: OEPA Commentor: OFFO  
Section #: Figure 2-1 Pg.#: Line #: Code: C  
Original Comment #  
Comment: Figure 2-1 shows the southern portion of Area 5 outlying the SSOD and tributaries near the Storm water Retention Basins. No samples are proposed in this area, though it appears to lie within the area defined as A5. Sampling should be conducted in this area.